

FILED

IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE  
DIVISION I

FEB 16 Rec'd  
DAVID G. TORRENCE  
CLERK  
DC

STATE OF TENNESSEE )

VS. )

PERRY AVRAM MARCH )

CASE NOS: 2004-D-3113 & 2005-D-2854

**MOTION IN LIMINE NO. 2**

The Office of the District Attorney General, prosecuting on behalf of the State of Tennessee, moves this Court to instruct defense counsel not to ask any witness about prior bad acts or criminal convictions without requesting a jury out hearing pursuant to Rule 608 and 609 of the Tennessee Rules of Evidence.

Respectfully submitted,



Tom Thurman  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been mailed to **John E. Herbison, Attorney at Law, 2016 Eighth Avenue South, Nashville, Tennessee 37204** and **William D. Massey, Attorney at Law, 3074 East Street, Memphis, Tennessee 38128**, on this the 15<sup>th</sup> day of **February, 2006**.

